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May 29, 2020

**VIA ECF**

Hon. Barbara Moses  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007

**Re: Julian, et al. v. Metropolitan Life Insurance Co., No. 1:17-cv-00957-AJN-BCM**

Dear Magistrate Judge Moses:

We represent Plaintiffs in the above-referenced action. Pursuant to Your Honor's Individual Rule of Practice 3, Plaintiffs submit this letter motion regarding the filing under seal of an exhibit to the Declaration of Michael D. Palmer in Support of Plaintiffs' Opposition to Defendant's Motion to Dismiss the Time-Barred Claims in Plaintiffs' Third Amended Complaint. Based solely on the parties' Amended Confidentiality Agreement (Dkt. No. 122) and Defendant's request that the document be filed under seal, Plaintiffs submit Exhibit F (McKinney\_MLIC 003684-3685) as a proposed sealed document. For the same reason, Plaintiffs have also redacted the two sentences that quote from Exhibit F in their Memorandum of Law in Opposition to Defendant's Motion to Dismiss the Time-Barred Claims in Plaintiffs' Third Amended Complaint. Both Exhibit F and the unredacted Memorandum of Law are filed at the "Selected Parties" Viewing Level.

Per Your Honor's Rules, Plaintiffs have notified Defendant that it must file a letter explaining the need to seal or redact within three court days.

Respectfully submitted,

/s/ Michael D. Palmer  
Michael D. Palmer

c: All Counsel of Record (via ECF)